

EXHIBIT E
DECLARATION OF JANE DOE

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My name is Jane Doe and I am an Asian farmer in North Carolina. I am over the age of 18 and fully competent to make this declaration. In support of this Declaration, I offer the following:

1. I have a substantial interest in the outcome of this litigation and I am a member of the Farmers of Color Network of the Rural Advancement Foundation International. I am an individual that would be negatively impacted by the Temporary Restraining Order issued by the Court in this lawsuit, *Faust v. Vilsack*, No. 1:21-cv-548 (E.D. Wis.).
2. I live in North Carolina.
3. I am a poultry grower and have been raising poultry for sixteen years.
4. USDA is the guarantor on my loans with a Farm Credit system commercial lender.
5. As an Asian refugee and female farmer, I am a “socially disadvantaged farmer” pursuant to 7 U.S.C § 2279 (e)(2).
6. As an Asian farmer, I am eligible for the debt payment pursuant to Section 1005 of the American Rescue Plan, as passed by Congress and signed by President Biden on March 11, 2021.
7. My husband and I took out loans to start our poultry operation and still have several hundred thousand owing on those loans.
8. I am not delinquent in my loan payments.
9. I have participated in NRCS conservation programs.
10. I feel that as a female farmer and an Asian farmer, I am always forced to take an extra step. I have been denied participation in programs and have had to ask multiple times for assistance.

11. My husband passed away and it is nearly impossible for me to maintain the poultry operation on my own.

12. The coronavirus epidemic has created several kinds of instability in the industry. In the spring of 2020, there were substantial delays with processing facilities, which created disruption with flock size allowances, getting birds to processors and supply of new flocks.

13. I will be significantly damaged if the payment permitted by Congress is delayed by the action of the Court in this matter.

14. Because of the need for constant facility upgrades and the high demands of the poultry farming industry, I cannot continue to farm.

15. The payment of the guaranteed loan will provide me with the ability to consider marketing my property without pressure from buyers that want to take advantage of my status as a widowed female farmer.

16. If the debt payment authorized by law was made in a timely manner, I feel that I would have more options to consider for the stability of my farm and family. Because of the delay, I may not have a choice.

I declare under penalty of perjury that the foregoing is true and correct.

Date: __6-21-2021_____

Respectfully submitted,

Jane Doe

[Pseudonym]